REMARKS

Applicants hereby reply to the Final Office Action mailed January 10, 2005 within the shortened three month statutory period for reply. Claims 1-14 were pending in the application and the Examiner rejects claims 1-14. Support for the amendments may be found in the originally filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Rejections under 35 U.S.C. §102(b)

The Examiner rejects claims 1 and 10 under 35 U.S.C. §102(b) as being anticipated by Pettus (U.S. Patent No. 5,499,343). Applicants respectfully traverse these rejections. Pettus is limited to providing pre-fabricated functionality for system level services which application developers can modify or override to create customized solutions, thereby avoiding the procedural calls necessary with prior art application framework programs. Pettus expands object oriented methodology and application frameworks which provide pre-fabricated application components such as user interface elements and event triggered classes. Such frameworks are available for a number of different programming languages and operating systems.

Additionally, Pettus discloses a messaging system wherein a client computer requiring a service can transmit a request message to a server. The client computer and server computer operate under differing network protocols. A network protocol defines how two or more computers communicate over a network connection. Examples of network protocols include: HTTP, FTP, TCP/IP, IPX, DECnet, AppleTalk and NetBIOS/NetBEUI. Therefore, in order to facilitate the transport of messages between computing units connected to a network using differing network protocols, Pettus discloses a protocol translator.

As recited in Pettus, when a request for service originates at a client computer, the request is streamed across a network where it is received by an intermediary Network Service Facility (NSF). The NSF includes a protocol translator which formats the request packet into a server specific networking protocol prior to transmitting the request within the packet to a server. For example, if a client computer, configured to communicate over an AppleTalk network protocol, requires services of a server computer, configured to communicate over a TCP/IP protocol, then the AppleTalk packet carrying the request will need to be converted to a TCP/IP packet. The protocol translator of Pettus does not modify the request itself, but instead, modifies the vehicle carrying the request, namely the packet.

While the disclosure of Pettus generally refers to both messages and packets as "service requests" or "requests", those skilled in the art will appreciate that both are unique and separable. Further, Pettus recognizes the distinction as evidenced by: "At the server node, the <u>request packet is reformatted</u> at the protocol stack, including stripping the source address from the <u>packet</u> and caching that address (step 1512)." (column 17, lines 62-64 emphasis added). **Therefore, it is important to note the distinctions between a message and a packet, and significantly, that Pettus only reformats packets, not messages.**

A message may be constructed from any number of programming languages, scripting languages and markup languages including, for example, Java, VBScript, JScript, HTML, XML, etc. A message is a set of instructions to be processed by another computing component. The message is not concerned with how it is transferred between computing components. For example, a message comprising Java instructions may be transported across a network using either of HTML, TCP/IP or FTP protocols without a need to "translate" or reconfigure the message itself.

A packet, on the other hand, defines how the message is transported across a network (protocol) and is not concerned with how the message is processed once it arrives at the intended recipient. Pettus is limited to a system for reconfiguring a packet of one protocol to a packet of another protocol. As such, Pettus generally does not disclose or suggest "translating request messages", as similarly recited by independent claims 1 and 10, and particularly, does not disclose "translating the request message at the first computing platform into a platform independent language," as recited by independent claim 1.

Rejections under 35 U.S.C. §103(a)

The Examiner next rejects claims 2, and 13-14 under 35 U.S.C. §103(a) as being unpatentable over Pettus (U.S. Patent No. 5,499,343) and further in view of the official notice. Applicants respectfully traverse these rejections. Claims 2 and 13 variously depend from independent claims 1 and 10, therefore are allowable for at least the reasons described above with respect to independent claims 1 and 10, as well as in view of their own respective features. Independent claim 14 is allowable for at least the reasons described above with respect to independent claims 1 and 10, as well as in view of its own respective features because Pettus does not disclose or suggest a "request message", "parsing" or "creating a formatting mark-up language format of the request message".
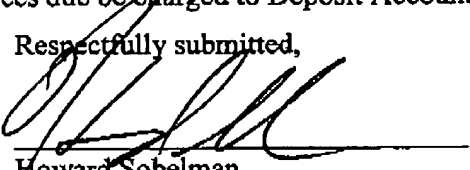
The Examiner rejects claims 5-8 under 35 U.S.C. §103(a) as being unpatentable over Pettus and further in view of Nakagawa et al (U.S. Patent No. 6,530,025). Claims 5-8 variously depend from independent claim 1, therefore are allowable for at least the reasons described above with respect to independent claims 1 and 10, as well as in view of their own respective features.

In view of the above remarks and amendments, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited prior art. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject Application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814.

Respectfully submitted,

Dated: 3/4/05

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